

Peter A. Leeming SBN 119124  
Law Offices of Peter A. Leeming  
108 Locust Street, Suite 7  
Santa Cruz, CA 95060

Telephone (831) 425-8000  
paleeming@sbcglobal.net

Attorneys for defendant  
DAVID CAMPOY

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

UNITED STATES OF AMERICA,	)	No. CR 20-0458 BLF
	)	
Plaintiff,	)	<b>STIPULATION AND <del>PROPOSED</del></b>
	)	<b>ORDER CONTINUING STATUS</b>
vs.	)	<b>CONFERENCE DATE FROM MAY</b>
	)	<b>10, 2022 TO JULY 26, 2022</b>
DAVID CAMPOY, et al	)	
	)	
	)	
	)	
Defendants.	)	
	)	
	)	

---

1. This matter is set for a status hearing on May 10, 2022 at 9:00 AM.  
The 23-count Second Superseding Indictment charges fifteen defendants with a  
variety of drug trafficking and firearms offenses. The case involves a substantial

1 volume of discovery, including multiple wiretaps, and has previously been found to  
2 be complex for Speedy Trial Act purposes.

3         2.       The government has been producing discovery on a rolling basis.  
4 Recently, the government provided new discovery to a subset of defense counsel, and  
5 anticipates producing that same material to all defense counsel in the coming weeks.

6         3.       Defense counsel anticipates additional discovery requests based on the  
7 review of the materials already provided. Both sides continue to meet and confer on  
8 discovery obligations.

9         4.       Finally, although not a statutory basis for exclusion of time from the  
10 Speedy Trial Act, various parties are actively engaging in settlement negotiations  
11 with the government, and additional resolutions are expected before the July 26, 2022  
12 proposed date.

13         5.       The parties stipulate that the ends of justice served by granting the  
14 requested continuance outweigh the best interest of the public and the defendants in a  
15 speedy trial, given the need for effective preparation of counsel.

16         For the above reasons, the parties respectfully request that the date of May 10,  
17 2022 be vacated, and that the matter be re-set for a status conference on July 26, 2022  
18 at 9:00 A.M.

19                 **IT IS SO STIPULATED.**

20 DATED:

\_\_\_\_\_/s/\_\_\_\_\_  
ALEXANDRA SHEPARD  
Assistant United States Attorney

21  
22  
23 DATED

\_\_\_\_\_/s/\_\_\_\_\_  
PETER LEEMING  
Attorneys for David Campoy

1 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
DOUGLAS RAPPAPORT  
2 Counsel for Defendant David Greenman

3 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
4 SEVERA KEITH  
5 Counsel for Defendant Kimberly Carrasco

6 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
7 JACK GORDON  
8 Counsel for Defendant Miguel Carrizal  
Zamora

9 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
10 RICHARD WEESE,  
11 Counsel for Defendant Jose Rodriguez  
Naranjo

12 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
13 NAOMI CHUNG  
14 Counsel for Defendant Nicholas Ardanuy

15 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
16 JERRY FONG  
17 Counsel for Defendant Ignacio Espinoza

18 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
19 ROBERT CAREY  
20 Counsel for Defendant Juan Johel Padilla

21 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
22 ALFREDO MORALES  
23 Counsel for Defendant Luis Sendino

24 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
25 ROBERT LYONS  
Counsel for Defendant Michael Osuna  
Guizar

1  
2  
3 **IN THE UNITED STATES DISTRICT COURT**  
4 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
5 **SAN JOSE DIVISION**  
6


7 UNITED STATES OF AMERICA, ) No. 20 CR-0458 BLF  
8 Plaintiff, ) ~~PROPOSED~~ ORDER  
9 vs. ) CONTINUING STATUS  
10 DAVID CAMPOY, et al, ) CONFERENCE DATE  
11 )  
12 Defendants. )  
13 )  
14 )

15 GOOD CAUSE APPEARING, it is hereby Ordered that the status conference  
16 set for May 10, 2022 the above matter is continued to July 26, 2022 at 9:00 A. M. for  
17 status.

18 The time between May 10, 2022 and July 26, 2022 is excluded from the  
19 Speedy Trial Act due to the need for defense investigation and effective preparation  
20 of counsel. Furthermore, the Court finds that the ends of justice served by granting  
21 the requested continuance outweigh the best interest of the public and the defendant  
22 in a speedy trial. The Court therefore concludes that this exclusion of time should be  
23 made under 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

24 It is so Ordered.

25 Dated: May 5, 2022

  
The Hon. Beth Labson Freeman United  
States District Court Judge